

1 JUDGE ROBERT J. BRYAN
2
3
4
5
6

7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 UNITED STATES OF AMERICA,) No. CR15-5351RJB
11 Plaintiff,)
12 v.) CERTIFICATION OF COMPLIANCE
13 JAY MICHAUD,) TO CrR 16 IN SUPPORT OF MOTION
14 Defendant.) TO COMPEL DISCOVERY

15 COLIN FIEMAN, hereby certifies that:

16 The facts alleged in the Motion and Memorandum in Support of Motion to
17 Compel Discovery are true and correct;

18 1. On July 14, 2015 the defense served omnibus discovery requests on the
19 Government.

20 2. Supplemental discovery requests were served on the Government on
21 September 9, September 23 and October 22, 2015. A copy of the October 22 discovery
22 request letter is attached as exhibit A to Mr. Michaud's Motion to Compel discovery.

23 3. The parties (represented by myself and AUSA Kate Vaughan) held
24 discovery conferences on October 29 and November 4, 2015.

25 ///

4. Despite engaging in discovery conferences and discussing the subject matter of this discovery motion with opposing counsel, we have been unable to reach agreement on resolution of the defense's requests for additional discovery.

DATED this 20 day of November, 2015.

s/ Colin Fieman
Colin Fieman
Assistant Federal Public Defender